

4/14/14

Dear Mt. Shasta City Council,

This report was requested by a Mt. Shasta City Council member and is in reference to the leach field associated with the Crystal Geyser plant on Ski Village Drive, Mt. Shasta.

I am Robert Blankenship of Harrison/Roberts Environmental Management. I am a graduate of CSU Long Beach and hold professional certification in Environmental Auditing and Site Assessment and Remediation from the University of California Irvine. I have over 20 years of experience personally supervising the installation, measurement and sampling of hundreds of groundwater monitoring wells throughout California. I am currently conducting the "Mt. Shasta Big Springs Area Groundwater Elevation Survey" with the support of local homeowners here in the Mt. Shasta area surrounding the Crystal Geyser Plant.

Danone Waters North America (DWNA) obtained an Industrial Waste Discharge Permit from the Regional Water Quality Control Board (RWQCB) in 2001. That permit allowed DWNA, and later CocaCola Dannon Waters (CCDA) to dump up to 3,000,000 gallons of untreated industrial waste per month into an underground leach field on its property. That leach field drains directly into the drinking water aquifer that supplies local wells. The industrial waste discharge permit allowed what was characterized as "bottle rinse water" and "floor water" to be discharged directly into the drinking water aquifer. CCDA's own analysis of the discharge indicated that acetone, antimony, other heavy metals, 2-butanone and phthalates were contained in the discharge, but the RWQCB permitted that discharge regardless. Essentially the permit allowed any residue from rinsing the plastic bottles, and anything that was spilled on the floor, to be dumped into the same aquifer that DWNA drew their water from and neighbors drink from. The CCDA well used to extract groundwater is considerably up gradient (or "upstream") from the waste discharge and thus it was thought that their wells would not be affected by the discharge. The general water flow pattern does indicate that the flow would take that discharge down gradient to local wells below the plant (west of Interstate 5). CCDA evidently obtained this permit because the City sewer system was inadequate to cope with the volume of wastewater generated by their operations.

After CCDA abandoned operations in 2010, it continued to pay the permit fees and conduct the compliance sampling necessary to keep the permit active. The permit (Waste Discharge Requirements, or WDRs) is similar to a car registration: i.e. you need to pay the fees and insurance in order to keep it active. CCDA paid those fees as this would allow a future user to seamlessly resume use of the leach field. As of today, the permit is still active and was transferred to the new owner (Crystal Geyser) with a simple letter from both users. There is no requirement in the permit that the City, larger community, or County be notified if the waste discharge is resumed. The ongoing monitoring conducted by CCDA has shown contamination of the aquifer with toluene and butyl phthalate, albeit at very low concentrations. The presence of these organic solvents and plasticizers in a drinking water aquifer, at any concentration, indicates that

continued use of the leach field for dumping industrial waste would be a reckless disregard of environmental stewardship.

My understanding is that Crystal Geyser has informed the Mt. Shasta City Council that they do not intend to use the leach field in their operations and that decision should be applauded. Crystal Geyser has also stated they want to be a conscientious member of the community and afford necessary environmental protections for their operations. Since all interested parties agree that the leach field should go, it is a simple matter for Crystal Geyser to submit a written request to the RWQCB to rescind that permit (Crystal Geyser needs to do this since they are the current permit holder). This is a very simple, single page written request that the RWQCB could handle very quickly.

By directing Crystal Geyser to rescind the leach field permit, they will realize many benefits such as honoring their verbal commitment to the City Council and the RWQCB, respecting the environmental integrity of the larger Mt. Shasta community, and saving money by eliminating the permit fees. It is truly a win-win. If this issue is handled promptly and professionally, the City Council should have written documentation of the permit rescission within 30 days, and Crystal Geyser will have built a valuable bridge to the community.

In order to retain 'local control' of discharge, this is what you ask Crystal Geyser to do immediately:

"Please rescind the Executive Order 5-01-233." This will ensure that Crystal Geyser cannot simply make a phone call and begin using the leach field and hence begin the extraction of more water without anyone's consent or prior knowledge. You have stated that you can control the volume of water extraction by having control of the effluent process. Rescinding Executive Order 5-01-233 is the only way to accomplish this for certain.

Sincerely,



Robert Blankenship
Harrison/Roberts Environmental Management

cc: RWQCB, Redding